

EXHIBIT 4

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE KLA-TENCOR CORP. SECURITIES
LITIGATION

THIS DOCUMENT RELATES TO:

Case No. 06-4065 CRB
Case No. 06-4709 CRB
Case No. 06-5225 CRB

Master File No. C-06-04065-CRB

CLASS ACTION

**DECLARATION OF MICHAEL T.
BANCROFT, CPA REGARDING
DISSEMINATION OF NOTICE
TO THE CLASS**

DATE: September 26, 2008

TIME: 10:00 a.m.

CTRM: 8

The Honorable Charles R. Breyer

I, Michael T. Bancroft, CPA, depose and say that the following is true and correct to the best of my knowledge, information and belief.

1. I am a partner in the Certified Public Accounting firm of Heffler, Radetich & Saitta L.L.P. ("HR&S"), the main offices of which are at Suite 1700, 1515 Market Street, Philadelphia, Pennsylvania 19102. I have personal knowledge of the matters set forth in this Declaration and, if called upon as a witness, I could and would competently testify to these matters under penalty of perjury.

2. HR&S performed the services listed herein under my supervision relating to the dissemination of the "Notice of Class Action Certification, Proposed Settlement, Motion for [C-06-04065-CRB] DECLARATION OF MICHAEL T. BANCROFT, CPA REGARDING DISSEMINATION OF NOTICE TO THE CLASS

1 Attorneys' Fees and Expenses and Hearing Thereon", dated June 27, 2008, along with the "Proof
2 of Claim and Release" form attached thereto (herein referred to collectively as "the Notice"), to the
3 Class under the direction of Lead Counsel. A copy of the Notice is annexed hereto as Exhibit A.

4 3. HR&S received two excel files from counsel for Defendants: (a) a file containing
5 1,029 names and addresses of shareholders who had shares issued to them during the period from
6 June 30, 2001 through March 24, 2002; and (b) a file containing 480 names and addresses of
7 shareholders who had shares issued to them during the period from March 23, 2002 through
8 January 29, 2007.

9 4. HR&S combined the two files containing 1,509 records (items (a) and (b) above)
10 and removed 877 records as exact duplicates. HR&S electronically forwarded the remaining 632
11 records to a licensee of the United States Postal Service ("USPS") in order to request updated
12 mailing addresses based on the USPS's National Change of Address database. We incorporated
13 each updated address we received into our database and used the updated addresses in the mailing
14 described below.

15 5. HR&S received a shareholder listing of institutional shareholders of KLA Tencor
16 Corp. from Vickers Stock Research Corp. ("Vickers") through Lead Counsel. HR&S then
17 manually searched the master listing of Vickers' participants and identified 3,075 of the Vickers
18 addresses that were on the listing containing the names. We then entered the 3,075 names and
19 addresses provided to us by Vickers into a computer database to be used in mailing the Notice.

20 6. HR&S then transmitted the file to the firm printing the Notice that also provided
21 mailing services and arranged for the mailing of 3,707 Notices via postage pre-paid, first-class
22 USPS mail on June 27, 2008.

23 7. Also on June 27, 2008, HR&S sent a cover letter along with a Notice to each of the
24 265 brokerage firms and other nominees ("Nominees") in HR&S's Nominee contact file (the
25 "Nominee File") via postage pre-paid, first-class mail. The cover letter requested each Nominee to
26 research their files for applicable Class Members, to inform HR&S of the results of their research,
27 to provide HR&S with the names and addresses of potential Class Members to whom HR&S
28 would mail a Notice, to advise HR&S of the number of Notices they require for mailing, and/or to

1 confirm that their research yielded no Class Members. The HR&S Nominee File is a compilation
2 of brokerage firms and banks that are sent a notice in securities class actions administered by
3 HR&S, and from which HR&S expects a response.

4 8. On June 27, 2008 HR&S also mailed a Notice to each of the 113 banks
5 (“Institutions”) on HR&S’s Institution mailing file via postage pre-paid, first-class mail. This file
6 is a compilation of banks that are sent a notice in securities class actions administered by HR&S
7 merely to ensure that notice of this settlement has been disseminated widely; HR&S does not
8 necessarily expect a response from these Institutions.

9 9. Thus, on June 27, 2008, HR&S mailed or arranged to be mailed a total of 4,085
10 Notices via postage pre-paid, first-class mail to members and possible members of the Class.

11 10. Subsequent to June 27, 2008 HR&S has mailed additional Notices via postage pre-
12 paid, first-class mail (or via UPS for bulk shipments), as follows:

	Number of Notices Mailed
a. To entities based on written requests	10
b. To entities supplied by Nominees	260,795
c. To Nominees that requested Notices in bulk	<u>116,522</u>
TOTAL	377,327

17 11. Thus, through August 22, 2008 HR&S has mailed a total of 381,412 Notices via
18 postage pre-paid, first-class mail (or via UPS for bulk shipments), as described in paragraphs 3
19 through 10 above.

20 12. Additionally, HR&S caused the publication of the “Summary Notice” in Investor’s
21 Business Daily and the San Jose Mercury News on July 7, 2008. Affidavits obtained from: (a) the
22 Investor’s Business Daily; and (b) the San Jose Mercury News are annexed hereto as Exhibit B.

23 13. Through August 22, 2008, HR&S has received five requests for exclusion from the
24 Class. Copies of these requests are annexed hereto as Exhibit C. Through August 22, 2008,
25 HR&S has not received any objection to the Settlement, Plan of Allocation or Fee Petition.

26 14. HR&S has also posted the Notice on its website at
27 www.hrsclaimsadministration.com. Class members who learned of the settlement via the internet
28

1 or otherwise could obtain copies of the Notice through this website, if they had not received the
2 form by mail.

3 I declare under penalty of perjury that the foregoing is true and correct. Executed in
4 Philadelphia, Pennsylvania, this 26th day of August, 2008.

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9 MICHAEL T. BANCROFT, CPA
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